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9 Attorney for Defendants Kevin Abernathy,
10 Richard McCann and Kenneth Kerby

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 LATESHA WATSON,

14 vs. Plaintiff,

15 CITY OF HENDERSON; BRISTOL
16 ELLINGTON; KEVIN ABERNATHY;
17 KENNETH KERBY; DEBRA MARCH;
18 RICHARD DERRICK; RICHARD MCCANN;
19 NICK VASKOV; KRISTINA GILMORE;
20 DOES I through X, inclusive,

21 Defendants.

22 CASE NO.

23 Case No.: 2:20-cv-01761-APG-BNW

24 **STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANTS
KEVIN ABERNATHY, RICHARD
MCCANN AND KENNETH KERBY TO
REPLY TO PLAINTIFF'S RESPONSE TO
DEFENDANTS' MOTION TO DISMISS
PLAINTIFF'S COMPLAINT AND
MOTION TO DISMISS AND STRIKE
PLAINTIFF'S REQUEST FOR PUNITIVE
DAMAGES**

25 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff, Latesha
26 Watson, by and through her counsel, Mark Cook, Esq., of the law firm of Cook & Kelesis, LTD.
27 and Defendants, Kevin Abernathy, Kenneth Kerby and Richard McCann, by and through their
28 counsel of record, Nicholas M. Wieczorek, Esq., of the law firm of Clark Hill PLLC, hereby
respectfully submits this Stipulation to extend time for Defendants to reply to Plaintiff, Latesha
Watson's, Response [Dkt 46] to Defendants' Motions to Dismiss [Dkt 33], currently due
February 23, 2021, an additional five (5) days, up to and including, March 1, 2021.

Although Defendants' counsel has been actively working on the Replies, Defendants'
counsel has been unable to complete the Replies due to numerous substantive motions and

1 responses; as well as other general appearances and deadlines. This request for an extension is
2 made in good faith and not for the purposes of delay.

3 WHEREFORE, the parties respectfully request that the Defendants' Replies to Plaintiff's
4 Responses to Defendants' Motions to Dismiss, be extended an additional five (5) days, up to and
5 including March 1, 2021.

6 DATED this 18th day of February 2021.

7 **CLARK HILL PLLC**

8 /s/ Nicholas M. Wieczorek
9 NICHOLAS M. WIECZOREK, ESQ.
Nevada Bar No. 6170
10 3800 Howard Hughes Parkway, Suite 500
Las Vegas, NV 89169
11 Telephone: (702) 862-8300
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12 NWieczorek@ClarkHill.com
13 Attorney for Defendants Kevin Abernathy,
Richard McCann, and Kenneth Kirby

DATED this 18th day of February 2021.

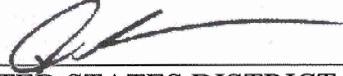
COOK & KELESIS, LTD.

14 /s/ Julie L. Sanpei
MARC P. COOK, ESQ.
Nevada Bar No. 4574
JULIE L. SANPEI, ESQ.
Nevada Bar No. 5479
517 South Ninth Street
Las Vegas, NV 89101
Telephone: (702) 737-7702
Facsimile: (702) 737-7712
law@bckltd.com
15 Attorneys for Plaintiff, Latesha Watson

16 **ORDER**

17 IT IS SO ORDERED.

18 February 19, 2021
19 DATED



20 UNITED STATES DISTRICT COURT JUDGE

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From: Julie Sanpei <JSanpei@bckltd.com>
Sent: Thursday, February 18, 2021 3:45 PM
To: Marina, Gia N. <gmarina@ClarkHill.com>
Cc: Marc Cook <MCook@bckltd.com>; Shannon Fagin <SFagin@bckltd.com>; Wieczorek, Nicholas <nwieczorek@clarkhill.com>
Subject: RE: Watson v. City of Henderson

[External Message]

Gia:

You may attach my e-signature.

Julie L. Sanpei

Julie L. Sanpei, Esq.
COOK & KELESIS, LTD.
517 South Ninth Street
Las Vegas, Nevada 89101
(702) 737-7702
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From: Marina, Gia N. <gmarina@ClarkHill.com>
Sent: Thursday, February 18, 2021 3:13 PM
To: Julie Sanpei <JSanpei@bckltd.com>
Cc: Marc Cook <MCook@bckltd.com>; Shannon Fagin <SFagin@bckltd.com>; Wieczorek, Nicholas <nwieczorek@clarkhill.com>
Subject: RE: Watson v. City of Henderson

Thank you for the courtesy, Julie! Attached is the proposed stipulation. Please let me know if I may use e-signature.

Thank you.

Gia N Marina
Associate

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From: Julie Sanpei <JSanpei@bckltd.com>
Sent: Thursday, February 18, 2021 1:27 PM
To: Marina, Gia N. <gmarina@ClarkHill.com>
Cc: Marc Cook <MCook@bckltd.com>; Shannon Fagin <SFagin@bckltd.com>
Subject: Watson v. City of Henderson

[External Message]

Gia:

We have no problem with your request for additional time to prepare a reply to Plaintiff's response. Please send over the Stipulation.

Thanks.

Julie L. Sanpei

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